

### **REMARKS**

Claims 1-25 are currently pending in the application, of which claims 1 and 14 are independent claims. Claims 26-33 were previously withdrawn.

Applicants request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

#### ***Rejections Under 35 U.S.C. § 103***

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,800,350 issued to Van Hal, *et al.* ("Van Hal") in view of U. S. Patent No. 6,791,256 issued to Nishizawa, *et al.* ("Nishizawa"). Applicants respectfully traverse this rejection for at least the following reasons.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the reference or references, when combined, must disclose or suggest all of the claim limitations. The motivation to modify the prior art and the reasonable expectation of success must both be found in the prior art and not based upon a patent applicant's disclosure. *See in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The examiner has failed to establish a prima facie case of obviousness. There is no suggestion or motivation to modify Van Hal in view of Nishizawa. The Office Action states that it would have been obvious to one of skill in the art to modify Van Hal in view of Nishizawa to provide a good display for a longer period of time (pages 3-4). Van Hal discloses an organic electroluminescent device with a moisture-absorption sheet having a high content of moisture-absorbing material (col. 1, lines 40-45). The moisture-absorption sheet of Van Hal is "able to absorb moisture during the whole lifetime of the organic electroluminescent device" (col. 3, lines

44-48). Furthermore, Van Hal discloses that his device includes “a moisture-impermeable layer which, in cooperation with the substrate and an adhesive, encloses the electroluminescent element” (col. 6, lines 46-48). Therefore, one of skill in the art would not be motivated to modify Van Hal in view of Nishizawa because Van Hal already teaches a highly reliable organic electroluminescent device.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claim 1. Claims 2-13 depend from claim 1 and are allowable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claim 1, and all the claims that depend therefrom, are allowable.

Claims 1-5, 8-17, and 20-25 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,803,127 issued to Su, *et al.* (“Su”), U. S. Patent No. 6,791,256 issued to Nishizawa, *et al.* (“Nishizawa”), and further in view of U.S. Patent No. 5,321,102 issued to Loy, *et al.* (“Loy”). Applicants respectfully traverse this rejection for at least the following reasons.

The examiner has failed to establish a *prima facie* case of obviousness. There is no suggestion or motivation to modify Su in view of Nishizawa. The Office Action states that it would have been obvious to one of skill in the art to modify Su in view of Nishizawa to provide a good display for a longer period of time (pages 3-4). Su discloses an organic electroluminescent device with drying layers 50I and 50II (Fig. 3). This embodiment of Su provides a better drying effect and a longer lifetime for the organic EL element (col. 4, lines 1-6). Furthermore, Su discloses that “the substrate 22 and the sealing case 26 form an airtight space” (col. 3, lines 2-3). Therefore, one of skill in the art would not be motivated to modify Su in view of Nishizawa because Su already teaches a long lasting organic electroluminescent device.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1 and 14. Claims 2-13 and 15-25 depend from claims 1 and 14 and are allowable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1 and 14, and all the claims that depend therefrom, are allowable.

Claims 6, 7 and 18, 19 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,803,127 issued to Su, *et al.* ("Su"), U. S. Patent No. 6,791,256 issued to Nishizawa, *et al.* ("Nishizawa"), U.S. Patent No. 5,321,102 issued to Loy, *et al.* ("Loy"), and further in view of U.S. Patent No. 6,762,553 issued to Yokogawa, *et al.* ("Yokogawa"). Applicants respectfully traverse this rejection for at least the following reasons.

Applicants respectfully submit that claims 6-7 and 18-19 are allowable over Su in view of Nishizawa, and further in view of Loy and Yokogawa fails to cure the deficiencies of Su in view of Nishizawa, and further in view of Loy noted above with regard to claims 1 and 14. Hence, claims 6-7 and 18-19 are allowable at least because they depend from an allowable claims 1 and 14.

**CONCLUSION**

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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